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Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiff,

vs.

UNITED STATES BUREAU OF LAND
MANAGEMENT,

Defendant,

and

IONEER USA CORPORATION,

Defendant-Intervenor.

Case No.: 2:19-cv-01915-GMN-EJY

**STIPULATED AGREEMENT AND
THIRD EXTENSION OF DEADLINES
[ECF NO. 25] TO FACILITATE
SETTLEMENT DISCUSSIONS**

Plaintiff Center for Biological Diversity (“the Center”), Federal Defendant United States Bureau of Land Management (“BLM”), and Defendant-Intervenor Ioneer USA Corporation (“Ioneer”) (collectively the “Parties”) agree and stipulate as follows:

WHEREAS, the Parties previously submitted a Stipulated Agreement and Briefing Schedule for Motion for Preliminary Injunction and [Proposed] Order [ECF No. 9]

WHEREAS, the Parties previously agreed to extensions of the previous deadlines [ECF Nos. 18, 24].

WHEREAS, the Court approved the Parties’ stipulation to extend the briefing deadline to facilitate settlement discussions [ECF No. 25].

1 **WHEREAS**, the Parties have engaged in earnest settlement discussion but require
2 additional time to reach a final settlement, the Parties seek a third extension of the briefing
3 deadline [ECF No. 25], to facilitate settlement discussions that would serve the interests of
4 preserving judicial and the parties' resources.

5 **WHEREAS**, the Parties also seek an extension of answer deadlines to facilitate
6 settlement discussions that would serve the interests of preserving judicial and the parties'
7 resources.

8 **THEREFORE**, the Parties agree and stipulate:

9 1. If the Parties are unable to reach a settlement, the Center will file its reply to
10 BLM's and Ioneer's responses to the Center's motion for a preliminary injunction on or before
11 January 3, 2020.

12 2. If the Parties are unable to reach a settlement, the BLM and Ioneer will file their
13 answers to the Center's complaint on or before February 14, 2020.

14 3. The Parties respectfully request that the Court set an argument date on the
15 Center's motion for a preliminary injunction as early thereafter as possible.
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18 DATED this 20th day of December, 2019.

19 /s/E. Leif Reid

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22 JOSH M. REID
23 Nevada Bar No. 7497
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/s/Michelle-Ann C. Williams

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Counsel for Federal Defendants

1 /s/Allison N. Melton

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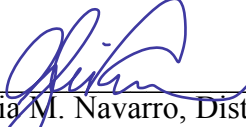
amelton@biologicaldiversity.org

(admitted pro hac vice)

Counsel for Plaintiff

7 **IT IS SO ORDERED.**

8 Dated this 23 day of December, 2019.

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11 _____
12 Gloria M. Navarro, District Judge
13 UNITED STATES DISTRICT COURT
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